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11 Attorneys for Defendant VIZIO, INC.

12 UNITED STATES DISTRICT COURT  
13 CENTRAL DISTRICT OF CALIFORNIA  
14

15 SONY CORPORATION, a  
16 Japanese corporation,  
17 Plaintiff,  
18 v.  
19 VIZIO, INC., a California  
corporation,  
20 Defendant.  
21

Case No. SA CV 08-01135-RGK (FMOx)

**DECLARATION OF STEVEN J. CORR  
IN SUPPORT OF DEFENDANT VIZIO,  
INC.'S MOTION FOR TEMPORARY  
STAY AND/OR THIRTY-DAY  
CONTINUANCE OF THE APRIL 6,  
2009 SCHEDULING CONFERENCE**

Date: April 6, 2009  
Time: 9:00 a.m.  
Judge: Hon. R. Gary Klausner  
Courtroom: 850

22 I, Steven J. Corr, declare as follows:  
23

24 1. I am an associate with Jones Day, counsel of record for Defendant  
25 Vizio in this action. I make this declaration in support of Vizio's Motion for  
26 Temporary Stay and/or Thirty-Day Continuance of the April 6, 2009 Scheduling  
27 Conference. The following is based on my personal knowledge and, if called as a  
28 witness, I could and would competently testify thereto.

1           2.     Attached as Exhibit A hereto is a true and correct copy of Vizio's  
2 Complaint for Declaratory Judgment, Trade Libel, Disparagement, and Violation of  
3 Lanham Act filed on October 10, 2008 in the civil action entitled *Vizio, Inc. v. Sony*  
4 *Corporation et al.*, Civil Action No. 08-5029 (FSH) (PS) ("the New Jersey action").

5           3.     Attached as Exhibit B hereto is true and correct excerpted copy  
6 (without exhibits) of Sony's Answer to Complaint, Separate Defenses,  
7 Counterclaims and Demand for Jury Trial filed on February 2, 2009 in the New  
8 Jersey action.

9           4.     Attached as Exhibit C hereto is a true and correct copy of the Order on  
10 Informal Application entered on January 16, 2009 in the New Jersey action.

11          5.     Attached as Exhibit D hereto is a true and correct copy of the  
12 Scheduling Order entered on January 16, 2009 in the New Jersey action.

13          6.     Attached as Exhibit E hereto is a true and correct copy of Defendants'  
14 Brief in Support of Their Motion to Transfer This Action to the Central District of  
15 California Pursuant to 28 U.S.C. § 1404(a) filed on January 23, 2009 in the New  
16 Jersey action.

17          7.     Attached as Exhibit F hereto is a true and correct copy of Plaintiff's  
18 Opposition to Defendants' Motion to Transfer This Action to the Central District of  
19 California Pursuant to 28 U.S.C. § 1404(a) filed on February 2, 2009 in the New  
20 Jersey action.

21          8.     Attached as Exhibit G hereto is a true and correct copy of Sony's  
22 letter, dated February 27, 2009 that was submitted to the court in the New Jersey  
23 action.

24          9.     Attached as Exhibit H hereto is a true and correct copy of a January  
25 27, 2009 letter from Sony's counsel stating that Sony would not agree to  
26 temporarily stay this action pending resolution of Sony's motion to transfer the  
27 New Jersey action.

10. Attached as Exhibit I hereto is a true and correct copy of the Joint Discovery Plan filed by counsel for Sony and Vizio on March 12, 2009 in the New Jersey action.

11. On March 13, 2009, I participated in a conference call with other counsel who represent Vizio in the New Jersey action. During that call, I was informed about the March 13, 2009 scheduling conference. Counsel informed me that Magistrate Judge Patty Shwartz indicated to the parties during the scheduling conference that she intends to issue an order setting forth the following scheduling deadlines: (1) deadline to file amended pleadings – September 10, 2009; (2) fact discovery cut-off – March 31, 2010; (3) final claim construction submissions under the Local Patent Rules – June 11, 2010; and (4) final pretrial conference – October 27, 2010.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Dated this 13<sup>th</sup> day of March, 2009.

Two 1. Cars

### Steven J. Corr